

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CARLOS KALMAR)	CASE NO.: 1:24-cv-00193
)	
and)	JUDGE: BRIDGET MEEHAN BRENNAN
)	
RAFFAELLA KALMAR)	
)	
Plaintiffs,)	
)	
-v-)	<u>STIPULATED MOTION FOR</u>
)	<u>EXTENSION TO RESPOND TO THE</u>
THE CLEVELAND INSTITUTE OF)	<u>AMENDED COMPLAINT</u>
MUSIC)	
)	
and)	
)	
VIVIAN SCOTT)	
)	
and)	
)	
SCOTT HARRISON)	
)	
and)	
)	
DEAN SOUTHERN)	
)	
and)	
)	
PAUL HOGLE)	
)	
Defendants.)	

Pursuant to this Court’s Standing Order, Section V.C, Defendants The Cleveland Institute of Music, Scott Harrison, Dean Southern, and Paul Hogle (the “CIM Defendants”) respectfully move this Court for an additional fifteen (15) days, up to and including March 15, 2024, in which to answer, move or otherwise respond to Plaintiffs Carlos Kalmar and Raffaella Kalmar’s (“Plaintiffs”) Amended Complaint. Plaintiffs’ counsel has stipulated and agree that the Court may enter an Order accordingly.

Respectfully submitted,

/s/ Monica L. Lacks

Monica L. Lacks (0078649)
Rebecca J. Bennett (0069566)
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Key Tower
127 Public Square, Suite 4100
Cleveland, OH 44114
216.241.6100
216.357.4733 (FAX)
rebecca.bennett@ogletree.com
monica.lacks@ogletree.com

Jantzen D. Mace (0099005)
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Key Bank Building
88 East Broad Street, Suite 2025
Columbus, OH 43215
614.494.0420
614.633.1455 (FAX)
jantzen.mace@ogletree.com

*Attorneys for Defendants The Cleveland Institute of
Music, Scott Harrison, Dean Southern and Paul
Hogle*

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2024, a copy of the foregoing *Stipulated Motion for Extension to Respond to Amended Complaint* was electronically filed with the Clerk of Court using the CM/ECF system. Notice of filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Monica L. Lacks

Monica L. Lacks (0078649)

One of the Attorneys for Defendants